

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re SONY BMG CD TECHNOLOGIES LITIGATION	: Civil Action No. 05-CV-09575-NRB
	: CLASS ACTION
This Document Relates To:	; ;
ALL ACTIONS.	: x

NOTICE OF MOTION AND MOTION TO ADMIT COUNSEL PRO HAC VICE AND DECLARATION OF ROBERT M. ROTHMAN IN SUPPORT THEREOF

PLEASE TAKE NOTICE upon the annexed Affidavit of Lawrence E. Feldman, executed this 25th day of January, 2006, and the Certificate of Good Standing attached thereto, Plaintiffs Tom Ricciuti, Yvonne Ricciuti, and Mary Schumacher move this Court, pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, that Lawrence E. Feldman, a member of the Bar of the Supreme Court of Pennsylvania and the sole proprietor of the firm, Lawrence E. Feldman & Associates, be admitted *pro hac vice* for all purposes on behalf of plaintiffs in this action.

DATED: February 2, 2006

LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP ROBERT M. ROTHMAN (RR-6090)

ROBERT M. ROTHMAN

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GREEN WELLING LLP ROBERT S. GREEN JENELLE WELLING AVIN P. SHARMA 595 MARKET STREET, SUITE 2750 San Francisco, CA 94105 Telephone: (415) 477-6700 (415) 477-6710 (fax)

LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP REED R. KATHREIN JEFFREY FRIEDMAN SHANNA SCARLETT 100 Pine Street, 26th Floor San Francisco, CA 94111 Telephone: (415) 288-4545 (415) 288-4534 (fax) LAWRENCE E. FELDMAN & ASSOCIATES LAWRENCE E. FELDMAN 432 Tulpehocken Avenue Elkins Park, PA 19027 Telephone: (215) 885-3302 (215) 885-3303 (fax) DECLARATION OF ROBERT M. ROTHMAN

I, Robert M. Rothman, declare as follows:

1. I am a member in good standing of the bar of this Court and a partner at Lerach

Coughlin Stoia Geller Rudman & Robbins LLP. I make this declaration in support of Plaintiffs Tom

Ricciuti, Yvonne Ricciuti, and Mary Schumacher's Motion, pursuant to Rule 1.3(c) of the Local

Civil Rules of this Court, that Lawrence E. Feldman be admitted pro hac vice for all purposes on

behalf of plaintiffs in this action.

2. Lawrence E. Feldman is fully familiar with this action.

3. As evidenced in the annexed Affidavit of Lawrence E. Feldman, he is an attorney in

good standing of the Bar of the Supreme Court of Pennsylvania.

4. I respectfully request that plaintiffs' motion be granted in all respects. A proposed

Order is enclosed herewith.

I declare under penalty of perjury under the laws of the State of New York, that the foregoing

is true and correct.

DATED: February 2, 2006

ROBERT M. ROTHMAN (RR-6090)

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- 3 -

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	Case No. 1:05-cv-09575-NRE
)	
SONY BMG CD)	
TECHNOLOGIES LITIGATION)	

AFFIDVIT OF LAWRENCE E. FELDMAN IN SUPPORT OF PLAINTIFFS' MOTION FOR *PRO HAC VICE* ADMISSION

I, Lawrence E. Feldman, being duly sworn, deposes and says that the following facts are true and correct to the best of his personal knowledge:

- 1. I am an attorney duly admitted to practice law in the Commonwealth of Pennsylvania.

 Attached hereto as Exhibit A is an original Certificate of Good Standing from the Bar of the Supreme Court of Pennsylvania.
- 2. I am not under suspension or disbarment by any court.
- I am the sole proprietor of the firm, Lawrence E. Feldman &
 Associates and my office is located at 432 Tulpehocken Avenue, Elkins Park, Pennsylvania,
 19027. My business telephone number is (215) 885-3302.
- 4. I make this affidavit in support of Plaintiffs' motion for admission *pro hac vice*.
- 5. I recognize that if I am admitted *pro hac vice*, I am within the disciplinary jurisdiction of the United States District Court for the Southern District of New York. Upon my admission *pro hac vice*, I agree to comply with all applicable New York Local Rules of Civil Procedure.

I declare under penalty of perjury and the laws of the United States of America that the foregoing

Case 1:05-cv-09575-NRB Document 35 Filed 02/03/06 Page 6 of 10

is true and correct. Executed this ______ day of January, 2006, at Elkins Park, PA.

Lawrence E. Feldman

Sworn to and subscribed to me this Ab day of January 2006,

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL MARJANI MERRITT, Notary Public City of Philadelphia, Phila. County My Commission Expires Hovember 5, 2007



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Lawrence Eugene Feldman, Esq.

DATE OF ADMISSION

December 2, 1980

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal Dated: January 24, 2006

Patricia A. Johnson Chief Clerk

CERTIFICATE OF SERVICE

On this the 2nd day of February, 2006, the foregoing documents were served by First Class Mail on the Counsel of Record listed on the attached Service List.

Kelly A. Stadelmann

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